

AO 91 (Rev. 11/12) Criminal Complaint

AUSA Margaret A. Steindorf (312) 353-3540

FILED**TD****12/13/2024****THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT****UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

FAN ZHANG;
ZEHAUN WEI;
HUAJING YAN;
SHENGNAN JIANG;
SHIQIANG LIAN; and
YE CAOCASE NUMBER: 24 CR 595
UNDER SEAL**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From on or about October 27, 2024 to on or about November 4, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

*Code Section**Offense Description*Title 18, United States Code, Section
1201

Kidnapping

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

DUSTIN GOURLEY

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 13, 2024 4:00PM*Judge's signature*City and state: Chicago, IllinoisJEFFREY COLE, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, DUSTIN GOURLEY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed for over 12 years. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that FAN ZHANG, ZEHAUN WEI, HUAJING YAN, SHENGNAN JIANG, SHIQIANG LIAN, AND YE CAO have violated Title 18, United States Code, Section 1201. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging the above individuals with kidnapping, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and my review of reports, surveillance video, interviews with the victims, and other documentation related to this case. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to

me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

PROBABLE CAUSE

Summary

4. In summary, and as set forth further below, the FBI has been investigating a kidnapping for ransom that occurred in Chicago on October 27, 2024, through November 1, 2024, when all four victims were released. The kidnappers demanded the father of Victim A, and later, Victim A him/herself, send cryptocurrency to the kidnappers in return for the safe release of Victims A–D. While kidnapped, the kidnappers forced Victim A to transfer cryptocurrency to wallets controlled by at least one of them, and later conducted independent transactions after gaining access, for a total of approximately \$15,000,000 in cryptocurrency assets. As set forth in greater detail below, through surveillance video footage and some positive victim identifications, the kidnappers have been identified as FAN ZHANG, ZEHAUN WEI, HUAJING YAN, SHENGNAN JIANG, SHIQIANG LIAN, and YE CAO.

Background on Kidnapping

5. According to Individual A, on October 27, 2024, at approximately 1:00 p.m.,¹ Individual A was called, through WeChat, a Chinese messaging application, by

¹ All times are Central Time.

his son's phone number, (xxx) xxx-9681² ("Victim A Phone").³ When he picked up, he recognized the voice on the other end of the conversation as his son ("Victim A"). Victim A told his father that Victim A and his family, Victim B, and Victim C had been kidnapped. FBI later learned that Victim D, the nanny for Victim A and Victim B, had also been kidnapped. Victim A told Individual A that the kidnapper demanded a ransom payment or they would be killed. The phone line was then disconnected. Individual A lives in Georgia, and according to Individual A, Victim A moved into a townhouse in Chicago ("Victim B Residence") on or about October 15, 2024, joining Victim B and Victim C⁴.

6. According to Individual A, during the same call, an unknown person who identified himself as the person holding Victim A and his family captive got on the line.⁵ The conversations took place in Chinese. When Individual A was informing law enforcement about the conversations, Individual A transcribed some of the conversations into English and provided it to law enforcement. Individual A said, "A

² In two previous warrants (24 M 871 and 24 M 834), this call was referred to as being from an unknown number. It was actually from Victim A's Phone. In a later interview with Individual A, Individual A clarified that the call from his son actually came through WeChat.

³ Individual A's first language is Mandarin, though he speaks some English. Therefore, the following information is a summary and not a direct translation.

⁴ Based on my training and experience, I know that cellular telephones, and various applications on cellular telephones, can be used as facilities or instrumentalities of interstate commerce in furtherance of the commission of offenses. Based on the investigation to date, ransom demands were made between Illinois and Georgia in furtherance of the kidnapping.

⁵ Previously, law enforcement believed based on conversations with Individual A that this conversation took place over instant message on WeChat. In a later interview with Individual A, Individual A reported that the conversation with the unknown person happened over WeChat on the same voice call as the call from Victim A. The wallet addresses were sent via instant message.

male kidnapper informed me via WeChat that I must send BTC/ETH⁶ to the provided wallet address within an hour, or they would kill the hostage. He also warned me not to call the police. I told him I don't have any BTC or ETH left, but he responded by saying to send whatever amount I had." Individual A also provided pictures of the QR codes of the wallet he was sent by the kidnappers to law enforcement.

7. According to Individual A, he told to the kidnapper that he did not have enough Bitcoin available at the time and that he would have to wait until Monday to purchase more.

8. Individual A told law enforcement that everyone in his family has the "Find My iPhone" application, and that according to the location data, in the hour prior to the first phone conversation with his son, Victim A's Phone was located at the Victim B Residence.

9. According to Individual A, October 27, 2024, at approximately 3:26 p.m., Individual A was contacted by an unknown phone number ending in -8358.⁷ An unknown male informed Individual A that he would be contacted again on Monday for further instructions. Individual A told law enforcement that Victim A's Phone location through the "Find My iPhone" application was then turned off.

10. On October 27, 2024, at approximately 5:00 p.m., law enforcement went to the Victim B Residence to conduct a well-being check. Upon arrival, law

⁶ In my training and experience, BTC is short for bitcoin and ETH is short for Ethereum. Both are popular cryptocurrencies which operate on a computer network and can only be accessed through electronic devices.

⁷ FBI has since determined that this is Victim D's number, in part, by interviewing Victim D.

enforcement knocked and announced its presence. After receiving no response, law enforcement turned the knob on the front door and discovered the door was unlocked.

11. Law enforcement entered the Victim B Residence and cleared the townhouse and attached garage for persons. Law enforcement did not find anyone inside the townhouse or the attached garage. Lights were on throughout most of the rooms, and containers of food were left out.

12. Law enforcement spoke with a neighbor, who said that the garage door of the Victim B Residence was open at approximately 7:30 a.m. on October 27, 2024. The neighbor noticed the open garage door because he/she shares interior space of the enclosed garage with the Victim B Residence.

13. Prior to leaving, law enforcement locked the front door to the townhouse, leaving the interior door to the garage unlocked, and exited through the garage door. There were two garbage bags of items that were left outside the garage door, which law enforcement placed back in the garage.

14. Law enforcement also observed an unopened food delivery left on the front porch. The receipt was dated October 27, 2024 at 9:44 a.m. There was also an unopened box addressed to “[Victim B], [at the Victim B Residence]” located on the porch, in front of the door.

15. Individual A told law enforcement that he purchased a BMW X6 for Victim A. According to a law enforcement database, Victim B has a BMW X6 registered to her. Law enforcement located that BMW X6 parked on the street within the townhouse property, unlocked.

16. On October 28, 2024, Individual A contacted law enforcement again because he found a reservation at the St. Regis Hotel booked on Victim A's American Express card which is under Individual A's account. The reservation was from October 27, 2024 to October 30, 2024.

17. Law enforcement contacted the St. Regis Hotel in New York and confirmed that Victim A did have a reservation, but never arrived.

18. According to Individual A, and then confirmed by law enforcement, Victim A and Victim B purchased United Airline tickets from Chicago to New York on October 27, 2024 on flight UA3592, returning on November 03, 2024 on flight UA1442. United Airlines confirmed that they never boarded the flight.

19. On October 31, 2024, Individual A contacted law enforcement again due to receiving an additional ransom call, this time from telephone number 312-545-8571.

20. Law enforcement requested exigent records associated with telephone number 312-545-8571 from multiple organizations, including Apple. Apple provided records that indicated that telephone number was associated with the below:

21. Apple ID: zhangfan8298@gmail.com

22. Name: FAN ZHANG

23. E-Mail: zhangfan8298@gmail.com

24. Address: xxxx Stevens Avenue, San Gabriel, CA

25. Business Phone Number: 626-xxx-8885

26. Verified Phone: 626-xxx-2218

27. Additional Phone: 312-545-8571

28. Law enforcement obtained an emergency request for records associated with 312-545-8571, and later a federal search warrant for historical and prospective location information (24 M 860). Records from T-Mobile indicated minimal outgoing/incoming calls. The records also indicated that the location of the telephone moved to the vicinity of O'Hare International Airport on November 1, 2024.

29. Law enforcement later learned that FAN ZHANG, along with ZEHUAN WEI, departed Chicago from O'Hare to Las Vegas, Nevada at 7:00 p.m. on November 1, 2024 via Spirit Airlines flight NK330.

Recovery of White Van

30. Law enforcement canvassed rental car companies at O'Hare and determined that WEI rented a vehicle from Avis Budget. Law enforcement met with an Avis Budget Group operations Manager at O'Hare Airport. The Operations Manager informed law enforcement that a white Chrysler Pacifica bearing Missouri license plate NK2T8S had been rented by WEI from the Avis Budget location in Hoffman Estates, IL on October 29, 2024 at approximately 5:04 p.m. According to the Operations Manager, the vehicle was rented by WEI and was returned at approximately 6:05 on November 1, 2024.

31. A federal search warrant was obtained and executed on the white Chrysler Pacifica, which led to the recovered of multiple items of evidence, including

DNA swabs, receipts, clothing, bottles, medical masks, cigarettes, AirPod case,⁸ backpack, and latent prints (24 M 871). The forensic analysis of the evidence items is currently pending.

Recovery and Interview of Victims

32. On November 1, 2024, Individual A contacted law enforcement again to advise that he had received a telephone call from Victim A, from a telephone number associated with Northwestern Memorial Hospital. Individual A added that Victim A stated that he was okay, and that he was with Victims B, C, and D.

33. Personnel from the FBI Violent Crime/Fugitive Task Force (VCFTF) responded to Northwestern Memorial Hospital.

34. After being discharged by medical personnel, Victims A, B, and D voluntarily agreed to be driven to FBI Chicago, located at 2111 West Roosevelt, Chicago, IL, in order to be interviewed regarding the kidnapping incident. Victim C stayed at Northwestern Memorial Hospital for monitoring.

35. Victim A told law enforcement s/he was kidnapped on October 27, 2024 by multiple men while s/he was getting out of the shower. Victim A explained that s/he later found out that Victim B or Victim D let the offenders into the garage after the offenders knocked on the door pretending to have caused damage to Victim A and B's garage. Victim A explained that s/he was immediately asked to conduct cryptocurrency transactions, sending his/her virtual assets to the offenders. Victim A

⁸ In a previous warrant, this was referred to as "iPods." That was a typographical error; and AirPod case was recovered.

advised that s/he, along with Victims B–D, were placed in a white sprinter van and driven for approximately one hour. Victim A advised that s/he felt the first house he and Victims B–D were taken to was an Airbnb due to the setup, and because a neighbor came by to advise the offenders could not park their van where it was parked. Victim A stated that s/he was driven around on multiple occasions by the offenders in order to make additional cryptocurrency transactions. Victim A stated that after one night, Victims A–D were moved to a different house for the additional time they were held in captivity. Victim A explained that s/he felt it was an Airbnb as well. Victim A advised that s/he was hit on the head with what s/he thought was a gun during the kidnapping, but otherwise, was treated fine.⁹ Victim A recalled eating McDonalds, Culvers, Subway, and PF Changs. Victim A explained that at times s/he had his/her glasses (s/he is nearsighted and the kidnappers took his/her glasses from him/her at times), at times s/he was zip-tied/duct taped, and at times, blindfolded. Victim A did not believe s/he could identify the kidnappers, as Victim A advised that the kidnappers were wearing masks. Victim A recalled being released on the afternoon of November 1, 2024, and walking to a dry cleaners who helped call an Uber. Victim A explained that s/he and Victims B–D went home, then took the same Uber to Northwestern Memorial Hospital. Victim A stated that there were multiple offenders, possibly five to six, who spoke Mandarin as well as Spanish.

36. Victim B told law enforcement that s/he recalled hearing a knock on the door, and Victim D speaking with an unknown individual who claimed to have

⁹ In a second interview, Victim A reported that he thought the gun was fake.

damaged the garage accidentally. Victim B went to the door and observed a man with a hat and glasses. Victim B added s/he was not wearing his/her glasses and couldn't see well. Victim B was asked by the unknown male if s/he spoke Chinese. The unknown male asked Victim B and Victim D to open the garage, because if it didn't work, the unknown male would give them money to repair it. Victim B and Victim D went to the garage, and opened the door. At this point, multiple unknown individuals with guns took control of Victim B and Victim D. Victim B and Victim D were asked questions regarding Victim A's family, then had their eyes covered and hands tied together. After Victim B told the unknown males that Victim A was upstairs, some of the unknown males went upstairs. Victim B recalled being moved, along with Victim D and Victim C, into the back alley and into the back of a van. Victim B recalled Victim A was eventually placed in a van, and then the van began driving. Victim B explained that four or five kidnappers were also in the van, and there was an additional car following the van. Victim B recalled stopping at some point for the leader of the group to force Victim A to make a phone call to his/her father. Victim B recalled that demands were made to Victim A's father for money, who replied that he didn't have the amount of money requested. Victim B explained that the van drove again, and ultimately arrived at a residence. Victim B recalled being moved into the residence and given a hamburger. Victim B explained that the wrapper was blue and white, and the receipt had an address that might have been Berwyn. Victim B recalled staying at the residence one night, then moving to a second residence where Victims A–D stayed in the basement. Victim B explained that they were provided

McDonald's and Panda Express. Victim B explained that on multiple occasions, Victim A made transfers of money to the kidnappers while being driven around by the kidnappers by him/herself. Victim B explained that the kidnappers became very angry after finding out that Victim A had an Apple Airtag in her/his wallet. On November 1, 2024, Victim B recalled being driven in another vehicle to an area where Victims A–D were freed. Victim B explained that they then walked to find help and were able to order a rideshare from the owners of a dry cleaners.

37. Victim B advised that s/he did not see the faces of the kidnappers, aside from the first individual with a hat/glasses but Victim B wasn't wearing his/her glasses. Victim B added that the kidnappers would also wear hat/masks. Victim B also stated that s/he was very afraid.

Identification of First Airbnb

38. On November 2, 2024, Victim A provided additional information to law enforcement. Victim A advised that s/he believed the first house that s/he was taken to by the kidnappers was located in the 1300 block of South Harlem, Forest Park, IL (South Harlem Airbnb).

39. Law enforcement conducted queries of Airbnb, which revealed that the South Harlem Airbnb was listed as an Airbnb property.

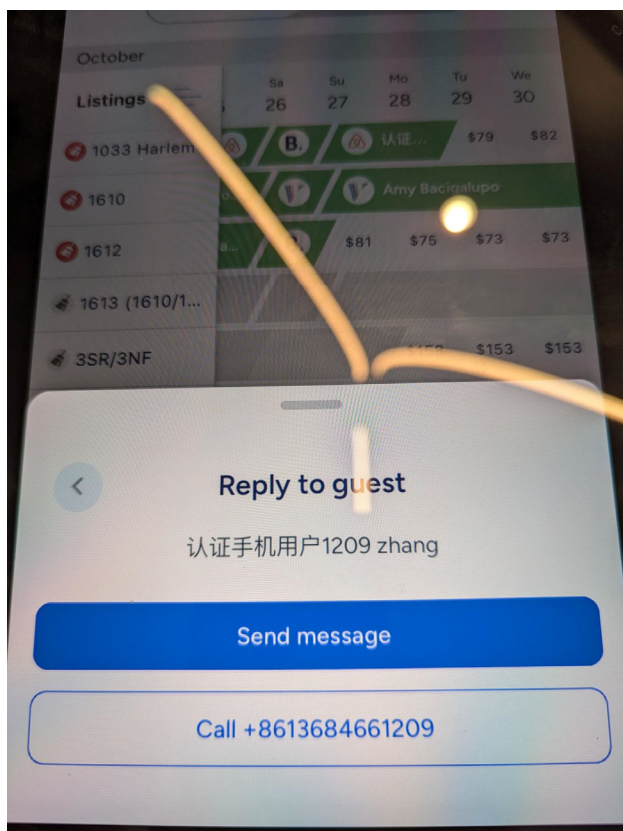
40. Law enforcement conducted queries of the Cook County Recorder of Deeds, revealing the owner of the South Harlem Airbnb as Witness A.

41. Law enforcement telephonically contacted Witness A, who advised that she was the owner of the South Harlem Airbnb. Witness A advised that the South

Harlem Airbnb was rented out, and the tenant then listed the South Harlem Airbnb on Airbnb. Witness A advised that the South Harlem Airbnb had exterior cameras.

42. Law enforcement contacted the tenant of the South Harlem Airbnb, Witness B. Witness B advised that the property was rented from October 27, 2024 to October 29, 2024 to Individual B for four guests.

43. Witness B added that when going through the process to rent the Airbnb, Airbnb provided additional information regarding the potential renters as the below:



44. Witness B voluntarily provided law enforcement with Ring camera footage from October 27 to October 29, 2024.

Review of Surveillance Footage

45. Law enforcement reviewed the surveillance footage from the South Harlem Airbnb. On October 27, 2024 at approximately 4:29 p.m., two offenders arrived at the South Harlem Airbnb in a white Ford sprinter van. One of the offenders appeared to exit the back-passenger area of the white Ford sprinter van while carrying a cellular telephone in his left hand. The offender (Offender 4) appeared to be wearing a hat, blue long-sleeve cover-alls, and a medical mask, pictured below:



46. The white sprinter van was observed bearing Illinois license plate 3784833B (Subject Sprinter Van).

47. The Offender 4 was observed speaking on his cellular telephone, while the second offender, the driver, exited the Subject Sprinter Van (Offender 2). Offender 1 entered the garage of the South Harlem Airbnb. Offender 2 is pictured below.



48. Shortly thereafter, a white Mercedes-Benz SUV parked behind the Subject Sprinter Van in the alley of South Harlem Airbnb. Two additional offenders were observed (Offenders 1 and 3), as depicted below:



49. At approximately 4:36 p.m., surveillance footage depicted Offenders 3 and 1 entering the South Harlem Airbnb, as depicted below:



50. Review of the surveillance footage showed that multiple offenders escorted Victims A-D into South Harlem Airbnb.

51. Based on review of the surveillance footage, at approximately 5:34 p.m., Offender 4 returned to the South Harlem Airbnb with what appeared to be bags from Culvers.

52. At approximately 7:41 p.m., Offenders 2 and 6 stood in the alleyway with what appeared to be groceries before they were let into the garage of South Harlem Airbnb.

53. At approximately 12:49 a.m. on October 28, 2024, the white Mercedes-Benz SUV with what appears to be an illegible California license plate was observed parking in the alleyway, with Offender 3 driving, and Offender 1 and Offender 2 escorting Victim A from the SUV into the alleyway towards the South Harlem Airbnb.

54. At approximately 10:55 a.m., on October 28, 2024, surveillance footage depicted a white Mercedes-Benz SUV bearing California license plate 9HJL306 (Subject Benz) parked in the alleyway behind the South Harlem Airbnb. Queries revealed the registered owner to be Individual C; Individual C was also the co-traveler with Fan Zhang to Beijing. The Subject Benz appeared to be the same SUV that was observed at South Harlem Airbnb the day before.

55. At approximately 11:18 a.m. on October 28, 2024, footage depicted Offenders 2-4 and Victim A getting into the Subject Benz.

56. At approximately 1:46 p.m., the Subject Benz returned. Footage depicted Victim A, along with Offender 2 and Offender 4, who were not driving, get out of the Subject Benz and return to South Harlem Airbnb.

57. At approximately 3:23 p.m., the footage depicted Offender 2 and Offender 4 escort Victim A back into the Subject Benz, with a driver who was not visible, and depart the area.

58. On October 28, 2024, at approximately 10:28 a.m., Offender 3 arrived at the South Harlem Airbnb with McDonalds. The offender was observed leaving the residence at approximately 11:00 a.m., and appeared to walk towards a white vehicle parked in the alleyway. Footage from the alleyway appeared to depict Offender 3 walking to and from the Subject Benz, which was parked in the alleyway behind the South Harlem Airbnb.

59. At approximately 11:17 a.m., Offender 3 was observed leaving the South Harlem Airbnb, followed by Victim A, then Offender 2 and Offender 4. All four individuals walked towards a white SUV parked in the alleyway.

60. At approximately 1:47 p.m., the footage showed Victim A, along with Offender 2 and Offender 4, re-entering the South Harlem Airbnb.

61. At approximately 3:22 p.m., Offender 2 and Offender 4 escorted Victim A towards the back alleyway, where a white vehicle was parked. Offender 5 was observed at the door, then was observed closing the door and staying inside the South Harlem Airbnb.

62. Beginning at approximately 5:20 p.m. on October 28, 2024, Offender 5 escorted Victims C-D to the alleyway while Offender 2 escorted Victim B.

Number of Offenders Based on Surveillance Footage

63. Based on review of the surveillance footage, law enforcement believes that at least six offenders appeared in the footage, as depicted below:

Offender #1



Offender #2



Offender #3



Offender #4



Offender #5



Offender #6



Information Regarding Rental Sprinter Van

64. During the review of the surveillance footage from the South Harlem Airbnb, the Subject Sprinter Van was seen with the license plate of 3784833B. Queries revealed that the plate was registered to Paragon Auto Leasing, located in Chicago, IL.

65. According records received by law enforcement from Paragon Auto Leasing, the Subject Sprinter Van was rented by Shiqiang LIAN on October 26, 2024, and returned on October 29, 2024.

66. On November 5, 2024, law enforcement went to Paragon Auto Leasing and located the Subject Sprinter van. Personnel from Paragon consented to the search of the Subject Sprinter Van. Personnel from Paragon advised that the Subject Sprinter van had not been rented to anyone since being returned by LIAN on October 29, 2024. Personnel from Paragon did advise that the Subject Sprinter van had been cleaned by being wiped down on the interior. During the consent search, law enforcement observed and recovered the below:

- a. A water bottle;
- b. White baby wipe;
- c. Unused white zip ties; and
- d. A copy of the rental agreement

67. Law enforcement received records from Bank of America associated with LIAN. Included in the records were a purchase at Home Depot on October 26, 2024 in Vernon Hills, IL; a Culvers purchase in Berwyn, IL, on October 27, 2024; and a purchase at BP in Oak Park, IL, on October 27, 2024.

68. Queries for travel revealed that LIAN traveled from Chicago, IL, to Los Angeles, CA, on November 1, 2024. According to Expedia, LIAN traveled on an American Airlines flight from Chicago, IL, to Los Angeles, CA, on November 1, 2024 at approximately 7:00 p.m. The reservation information was booked under the name Shengnan JIANG and included additional travelers Ye CAO, Huajing YAN, and LIAN.

69. Law enforcement conducted queries of telephone number 281-965-0315, a second telephone number provided by LIAN when renting the Subject Sprinter Van.

According to law enforcement databases, the number is associated with Huajing YAN, the same name listed as a co-traveler from Chicago to Los Angeles on November 1, 2024, along with LIAN, JIANG, and CAO.

Comparison of Identified Persons with Photographs of Offenders

70. Law enforcement conducted comparisons of photographs of identified persons in the investigation to still images of offenders from South Harlem Airbnb, as depicted below:

Offender #1 compared to California Driver's License Picture of Fan Zhang



Offender #2 compared to California Driver's License Picture of Huajing Yan



Offender #3 compared to Illinois Driver's License Picture of Shengnen Jiang



Offender #4 compared to California Driver's License Picture of Shiqiang Lian



Offender #6 compared to California Driver's License Picture of Zehaun Wei



Second Interview of Victims A and B and Photo Arrays

71. During a second interview with Victim A, Victim A told law enforcement there were times when the kidnappers did not wear masks, and law enforcement confirmed that the surveillance from the South Harlem Airbnb showed the same, so Victim A agreed to participate in multiple photo arrays. Victim A was shown multiple photo arrays by a blind administrator, with the below results:

- a. Group 1: No identification (group included Zehuan WEI)
- b. Group 2: Identified Huajing YAN
- c. Group 3: No identification, but stated that the photograph depicting Shengnan JIANG looked like the offender, but the offender looked older/thinner
- d. Group 4: Identified Shiqiang LIAN
- e. Group 5: Identified Fan ZHANG

72. During a second interview with Victim B, after being told that law enforcement located video from the South Harlem Airbnb and could see that there were times when Victim B was not blindfolded, Victim B agreed to participate in multiple photo arrays. Victim B was shown five photo arrays by a blind administrator, with the below results:

- a. Group 1: No identification (group included Zehuan WEI)
- b. Group 2: Identified Huajing YAN
- c. Group 3: Identified Shengnan JIANG
- d. Group 4: Identified Shiqiang LIAN
- e. Group 5: Identified Fan ZHANG

Identification of YE CAO

73. As stated above, law enforcement received records from Expedia, as well as law enforcement travel records, which revealed that YAN, JIANG, and LIAN all

traveled together from Chicago, IL, to Los Angeles, CA, on November 1, 2024, along with a fourth person, Ye CAO.

74. Law enforcement conducted a comparison of CAO to Offender #5, as depicted below:

CAO compared to U.S. Custom's and Border Patrol Picture of Offender #5



75. On November 27, 2024, law enforcement via a blind administrator conducted another photo array with Victim A and Victim B, separately. Both Victim A and Victim B identified CAO as one of the offenders who kidnapped Victims A–D.

Bitpie Cryptocurrency Wallets

76. Victim A provided information regarding the two cryptocurrency wallets that the kidnappers demanded Victim A transfer his/her cryptocurrency to. Victim A provided the following two wallets to law enforcement:

1JZc Zmbm spFn Rrai RrXv 6q5a PSMp Jyg5 EE (Subject Wallet 1)



THMy xKgd Sqcf jCsu kznM M1Bd UKPP 6vKC hD (Subject Wallet 2)

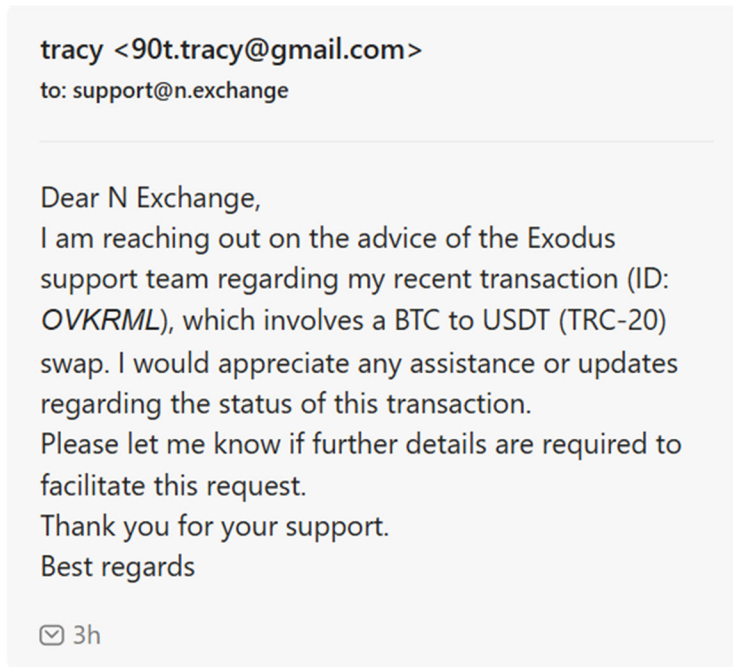


77. Law enforcement received records from Bitpie, a global decentralized multi-chain wallet, supporting various block chain assets such as Bitcoin, Ethereum, Tron, and Tether. The records from Bitpie included the below associated with Subject Wallet 1:

- a. UID: 8665659
- b. First login: 10/25/2024
- c. Last Login; 11/02/2024

78. Bitpie provided information that Subject Wallet 1 transferred 15 Bitcoin to Bitpie user UID 8542601.

79. Law enforcement received records from n.exchange, an API-based cryptocurrency exchange. Based on a preliminary block-chain analysis by FBI, the offenders utilized n.exchange. Records from n.exchange indicated the transactions associated with n.exchange were conducted associated with order ID OVKRML, e-mail address 90t.tracy@gmail.com. The following message was sent by the user:



n.exchange also provided information about the user for Know-Your-Customer (KYC) purposes, including a picture of a Southern California Edison bill for “Zhang, Fan,” with his current address and a picture of Fan ZHANG’s Chinese passport issued in June 2024. Depicted below is ZHANG’s passport photo and two selfies taken by the user, who appears to be ZHANG.



80. Law enforcement received records from Google regarding “90t.tracy@gmail.com,” which included a recovery SMS phone number of 626-567-0055.

81. Law enforcement reviewed financial records from MGM Resorts, which documented financial transactions conducted by Fan Zhang between July 4, 2023 and September 14, 2023. Information from MGM Resorts attributed 626-567-0055 to ZHANG.

Identification of Tether Cryptocurrency Wallet

82. Based on preliminary blockchain analysis conducted by the FBI, a Tether¹⁰ wallet appeared to contain funds associated with the kidnapping of Victims A–D:

TDEriGM2S3RxhBzGda2dgNE8NhVB4VxMuB (Subject Wallet 3)

83. On December 8, 2024, Tether contacted the FBI to provided information that an individual utilizing e-mail address “90t.tracy@gmail.com” had contacted Tether on December 8, 2024, and claimed ownership of Subject Wallet 3. As detailed earlier, 90t.tracy@gmail.com was identified as being utilized by Fan ZHANG.

¹⁰ Tether Limited (Tether) is a company registered to conduct business in the British Virgin Islands. Tether is the token manager and treasury for the USDT, a stablecoin pegged to the U.S. Dollar.

Comparison of Items found in Pacifica to Surveillance Footage

84. As mentioned above, the FBI recovered and conducted a search of the white Chrysler Pacifica rented by Zehaun WEI. Below of several evidence items that appear in surveillance footage of the South Harlem Airbnb:

Jacket Worn by Offender #2 (left) / Jacket Recovered (right)



Footage depicting hats worn by Offenders #4 & #5 (first two photos) / Hat Recovered
(second photo)



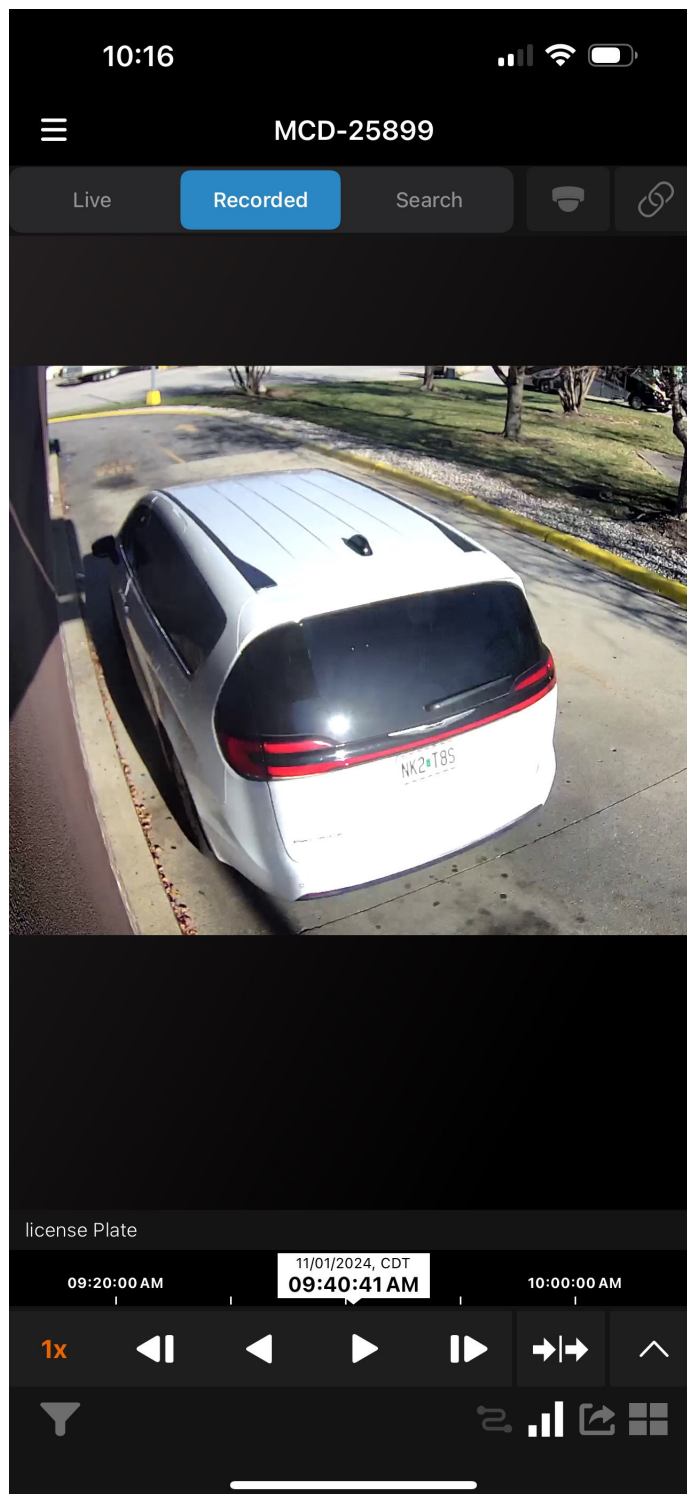
Footage showing Offender #5's gloves (left) / Recovered Gloves (right)



Recovered Surveillance Footage

85. Law enforcement recovered surveillance footage dated November 1, 2024 at approximately 9:40 a.m. from McDonald's in Hampshire, Illinois that shows an individual that appears to be JIANG ordering in the drive thru while driving the white Chrysler Pacifica. As described above, law enforcement searched the white Chrysler Pacifica and located a receipt from the McDonald's. As also mentioned above, the victims reported being fed McDonald's while they were held hostage. Screenshots from the footage are as follows:

White Chrysler Pacifica rented by ZEHUAN WEI



JIANG Driving the White Chrysler Pacifica

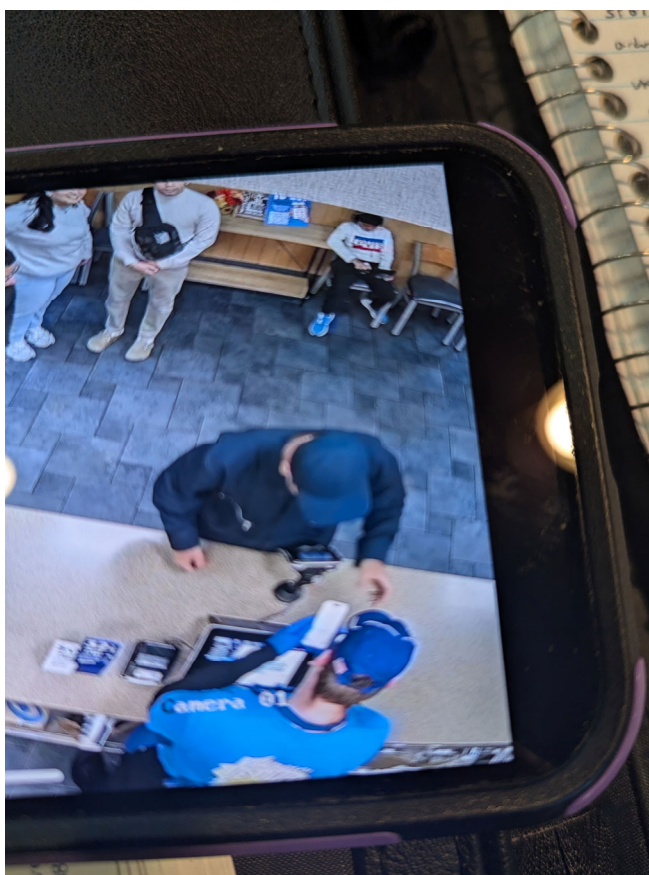


86. Law enforcement also recovered footage dated October 29, 2024 from Target in Streamwood, Illinois. In a search of the white Chrysler Pacifica, law enforcement also located a Target receipt. Surveillance footage showed an individual who appeared to be JIANG arrive at the Target. It also showed that individual leaving and driving away in a white Van. Target provided a receipt, which showed JIANG purchased athletic apparel, a wet brush, band-aids, “Mommys Bliss,” and a toy called “Make Believe.” JIANG paid in cash. Below is a screenshot from surveillance of the white van and JIANG exiting Target:



87. Law enforcement recovered a screenshot of surveillance footage from Culver's located in Berwyn, Illinois on October 27, 2024. Victim A reported that they

were fed Culver's, and Victim B reported remembering eating something with a blue and white wrapper and seeing a receipt from Berwyn. Review of footage showed LIAN arriving at the South Harlem Airbnb with a Culver's bag, and review of Bank of America records for LIAN showed a \$82.09 purchase on the same date at "Culver's of Berwyn, Berwyn, IL". The surveillance footage from Culvers showed an individual wearing clothing and a hat consistent with LIAN at the counter, as depicted below:



88. Law enforcement recovered surveillance footage dated October 27, 2024 from the BP gas station located at in Oak Park, Illinois. Law enforcement went to the BP gas station after review of Bank of America records for Shiqiang LIAN showed

that a \$29.15 purchase was made on October 27, 2024 at “BP#9175696 ROOSE OAK PARK IL.” Screenshots of the LIAN in the BP convenience store are as follows:



89. Law enforcement recovered additional footage from October 31, 2024 from Target in Schaumburg, Illinois. Law enforcement learned of the Target after recovering a receipt from the white Chrysler Pacifica. Target also provided a receipt, which showed purchases that included five Coke products, a purchase from the baby department “MAM,” and an apparel purchase for \$40. Screenshots are as follows, which depict JIANG:



90. Based on the foregoing, I submit that there is probable cause to believe that between October 27, 2024 and November 4, 2024, in Chicago, the Northern District of Illinois, Eastern Division, and elsewhere, Fan ZHANG, Zehaun WEI, Huajing YAN, Shengnan JIANG, Shiqiang LIAN, and Ye CAO have violated Title 18, United States Code, Section 1201 (kidnapping).

FURTHER AFFIANT SAYETH NOT.

Dustin Gourley
DUSTIN GOURLEY
Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone December 13, 2024.

Jeff Cole
Honorable JEFFREY COLE
United States Magistrate Judge